#000067586

ER/WM&I DDT

Performance Measure
Source/Driver: (Name & Number from ISP, IAG milestone, Mgmt. Action, Corres. Control, etc.)

Closure #: (Outgoing Corres. Control #, if applicable)

September 23, 1997
Due Date

W. R. Sproles/M. C. Broussard
Originator Name

G. D. DiGregorio
QA Approval

A. M. Tyson
Contractor Manager(s)

A. K. Sieben
Kaiser-Hill Program Manager(s)

T. G. Hedahl
Kaiser-Hill Director

Document Subject:

FIELD MODIFICATION TO THE PROPOSED ACTION MEMORANDUM FOR THE SOURCE REMOVAL AT THE MOUND SITE - AMT-111-97

KH-00003NS1A

97-RM-ER-0246-KH

Discussion and/or Comments:

Please find enclosed the Field Modification to the Proposed Action Memorandum for the Source Removal at the Mound Site. Agency concurrence is requested prior to commencing excavation tomorrow, September 24, 1997. Please provide DOE/RFFO with the Field Modification for their timely submittal to the EPA.

Thank you for your continued support. If you have any questions please contact Wayne Sproles at extension 5790.

Enclosure:
As Stated

WRS/aw

cc:
M. C. Broussard
A. C. Crawford
J. E. Law
W. R. Sproles
ER Records Center (2)

September 23, 1997

Tim Rehder
United States Environmental Protection Agency
Rocky Flats Project
999 - 18th Street, Suite 500
Denver, CO 80202-2466

FIELD MODIFICATION TO THE PROPOSED ACTION MEMORANDUM FOR THE SOURCE REMOVAL AT THE MOUND SITE

Per our conversation on September 22, 1997, a field modification to the Proposed Action Memorandum for the Source Removal at the Mound Site is required for the removal of the soil from three drums of radiological material buried at the Mound Site. This correspondence provides justification for the field modification and requests approval to conduct this removal action.

Based on gamma spectroscopy results, conducted by Radiological Engineering, the three drums of soil excavated from the T3 and T4 Hotspot were below the RFCA Tier II Radiological Subsurface Action Levels. However, after the drums were backfilled into the Mound excavation, errors were discovered in the conversion factors used for the analysis. The four composite samples collected from the three drums were shipped to an offsite laboratory for analysis using gamma spectroscopy. Based on the analytical results received on September 22, 1997, the three drums of soil exceed the RFCA Tier I Radiological Subsurface Action Levels. The following table summarizes the gamma spectroscopy results from the independent offsite laboratory:

SAMPLE NO. DRUM NO.	INDEPENDENT LABORATORY RESULTS PCI/G
DB00034RM D88422	382
DB00035RM (Duplicate) D88422	286
DB00036RM D88396	1150
DB00037RM D88422	323
Average Concentration*	602.33

- The sample and duplicate from drum D88422 were averaged prior to calculating the three drum average.

The removal of the contents from the three drums of radiologically contaminated soil at the Mound Site will involve the excavation of soil using a hydraulic excavator, the segregation of soil which exceeds three times background using a FIDLER, packaging of the contaminated soil in waste containers, and the transportation of waste containers to an approved temporary storage facility at RFETS. The waste will be stored until approval is obtained to ship the waste to an approved offsite disposal facility. Perimeter air monitoring for radionuclides and particulates will be performed during dust generating activities associated with the hot spot removal once the Mound over burden has been set aside.

Your concurrence is required prior to implementation, which is currently scheduled to begin on September 24, 1997. Thank you for your continued support of Environmental Restoration Projects. If you have any questions regarding this transmittal, please contact me at (303) 966-4839, or Norma Castaneda of my staff at (303) 966-4226.

Steve Slaten
Manager, Regulatory Liaison

Enclosures:
As Stated

_____ _____

Tim Rehder Date
EPA RFETS Lead Regulator